August 27, 2010

Bureau of Labor Statistics U.S. Department of Labor Attn: Carol Rowan 2 Massachusetts Ave. NE Room 4080 Washington, DC 20212

Re: Comments on proposed changes to ATUS OMB Number: 12200175

Dear Ms. Rowan,

On behalf of the National Alliance for Caregiving, the National Family Caregivers Association and Family Caregiver Alliance, we are writing to state our strong support for the proposed changes in the American Time Use Survey (ATUS). The data resulting from questions related to eldercare, as well as the module on leave, would greatly enhance current research and policy analysis efforts focused on the contributions of family caregivers to our long-term care system, specifically, and to society as a whole.

More than one in four adults (29%) in the U.S., or 65.7 million people, is a family caregiver, including 31% of all households. Existing research estimates the value of this caregiving at \$375 billion annually. While serving as the backbone of our long-term care system, family caregivers are at increased risk for health problems, stress, and depression and face increased financial burden, compared to non-caregivers. In order for family members and friends to receive the support and services they need to remain in their caregiving role, it is critical that we understand – to the best extent possible – the scope of their contribution and burden. The Bureau of Labor Statistics is perfectly positioned to help in those efforts. The proposed questions in the ATUS about who is providing unpaid eldercare, the time they spend providing this care, and the types of eldercare activities they perform would provide much-needed data to help us better understand caregiving in the U.S. With 57% of family caregivers being part of the workforce, the questions related to workers' access to and use of leave are equally valuable.

<sup>3</sup> National Alliance for Caregiving and AARP. (2009, November). Caregiving in the U.S. 2009.

<sup>&</sup>lt;sup>1</sup> National Alliance for Caregiving and AARP. (2009, November). *Caregiving in the U.S. 2009*. Washington, DC: Author.

<sup>&</sup>lt;sup>2</sup> Houser, A. & Gibson, M.J. (2008, November). *Valuing the invaluable: The economic value of family caregiving, 2008 Update.* Washington, DC: AARP Public Policy Institute.

As an organization whose mission is to be an objective national resource on family caregiving, the National Alliance for Caregiving (NAC) engages in research, policy analysis, coalition building and other activities focused on improving the quality of life for families and care recipients. In particular, the Alliance has published the field's leading reports on demographics and statistics of "Caregiving in the U.S," first in 1997 and updated in 2004 and 2009. We strive to collect the best information possible – access to valid, national data resulting from the ATUS would be an invaluable tool in our work.

With a focus on providing education, supportive communities and advocacy for all family caregivers regardless of their loved one's age or diagnosis, the National Family Caregivers Association (NFCA) builds the confidence and capabilities of hundreds of thousands of caregivers annually. Speaking with an authentic and trusted voice, NFCA empowers family caregivers to be proactive in their day-to-day lives, and it enhances the organization's efforts to remove barriers to the health and well-being of family caregivers and care recipients. Additional government data about family caregivers will do much to support our efforts.

Over 30 years ago, Family Caregiver Alliance (FCA) was the first community-based nonprofit organization to systematically address the needs of families providing long term care at home. Currently FCA operates direct caregiver support services in the San Francisco Bay Area and operates a national call center for family caregivers. The National Center on Caregiving provides technical assistance to policy makers and program developers, operates the Clearinghouse of programs and policy issues, conducts policy research and advocates on behalf of caregiving families.

If it is possible to go beyond the list of proposed eldercare questions, our organizations recommend the following additions:

- The relationship of the caregiver to the care recipient (e.g. daughter, friend, spouse)
- The length of time in weeks, months or years that the caregiver has been providing care

We are greatly encouraged by the proposed addition of these questions to the ATUS. With the aging of the population, an increasing number of Americans are expected to spend more time providing care to sick or aging spouses, parents, siblings, friends and others. The Bureau of Labor Statistics' survey work presents a valuable opportunity to collect information that will help us better understand who family caregivers are and the benefits they provide to their care recipients and to society.

Please feel free to contact us for further assistance. Thank you for your time and attention.

Sincerely,			

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Gail Hunt President and CEO National Alliance for Caregiving Alliance Sugar Ming

Suzanne Mintz President and CEO National Family Kathleen Kelly Executive Director Family Caregiver

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Caregivers Association